



COUNTY SANITATION DISTRICTS OF LOS ANGELES COUNTY

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JAMES F. STAHL
Chief Engineer and General Manager

March 18, 2005
 File: 01/05-5093
 Account No. 1196030

Peter Nash
 Plant Engineer
 SHULTZ STEEL CO.
 5321 E. Firestone Boulevard
 South Gate, CA 90280

Dear Mr. Nash:

Significant Noncompliance (SNC) for 2004

According to the Sanitation Districts' records, the reported dissolved sulfide concentration in your wastewater exceeded the Districts' limit of 0.1 mg/l on at least one occasion in 2004. As a result of this violation, your company was included in the list of dischargers in Significant Noncompliance (SNC) for 2004. In accordance with federal regulations (attached), the United States Environmental Protection Agency requires that sewerage agencies annually publish a list of industrial users which, during the previous twelve months, were in Significant Noncompliance with applicable pretreatment requirements. This list was published in the Los Angeles Times on March 14, 2005.

The wastewater discharge dissolved sulfide limit of 0.1 mg/l is largely intended to control sewer corrosion. Often times at high concentrations dissolved sulfides will result in a "rotten egg" odor. Your company should operate and maintain the existing pretreatment systems to consistently meet the dissolved sulfide limit included in your Wastewater Discharge Permit; failure to do so will result in enforcement actions against your company. Clarifiers should be kept clean and chemical oxidizers such as chlorine and hydrogen peroxide be used if housekeeping procedures alone prove to be inadequate.

It is very important to follow the proper sampling, preservation and analytical techniques in determining the dissolved sulfide concentration of the wastewater. For example, the dissolved sulfide analysis could result in a higher than actual concentration (false positive) if the collected sample is not immediately refrigerated. Also, always use a grab sample for sulfide analysis; 24-hour composite samples should never be used for dissolved sulfide compliance purposes. Please make sure that your certified laboratory, used to report required monitoring data, is using the appropriate analytical procedure in performing the dissolved sulfide analysis as described in "Standard Methods for the Examination of Water and Wastewater".

The Districts are sponsoring several free training seminars in April 2005 to educate permittees regarding the federal SNC criteria. It is very important that a responsible official(s) from your company attend one of these scheduled seminars. These seminars are similar to those that were presented by the Districts' staff in June 2004. If you have previously attended such a seminar, your attendance is not necessary. Please fill out the enclosed registration form and return it to the Sanitation Districts, attention Harry Mehta, as soon as possible. At the seminars the Districts' staff will be available to answer any questions you may have regarding your Wastewater Discharge Permit requirements.

Please be advised that the Districts are aggressively pursuing escalated enforcement actions including seeking civil penalties against those companies that are included in the SNC list for consecutive years.

The Districts appreciate your continued attention and commitment to achieving compliance with all wastewater discharge regulations. If you have any further questions regarding this matter please contact Enforcement Project Engineer Harry Mehta at extension 2903, or e-mail your inquiries to hmehta@lacsd.org.

Very truly yours,

James F. Stahl

Robert M. Wienke
 Supervising Civil Engineer

RMW:ss

Enclosures